LWD, INC. KYD088438817

EPA-R4-2017-004931 SELECTED DOCUMENTS (Doc Date Order)

3/20/2017

DOC DATE 03/17/2006	<u>DOCID</u> 10448938	PAGES 2	TITLE SUBJECT POLLUTION REPORT - (POLREP) NUMBER 3 COVERING REPORTING PERIOD 03/13/2006 THROUGH 03/17/2006.
05/15/2006	10448939	2	POLLUTION REPORT - (POLREP) NUMBER 4 COVERING REPORTING PERIOD 05/08/2006 THROUGH 05/12/2006.
06/13/2006	10448940	2	POLLUTION REPORT - (POLREP) NUMBER 5 COVERING REPORTING PERIOD 05/16//2006 THROUGH 06/13/2006.
07/12/2006	10556375	2	POLLUTION REPORT (POLREP) NUMBER 6 FOR THE REPORTING PERIOD 06/14/2006 TO 07/12/2006, L W D, INC. SITE, CALVERT CITY, KENTUCKY.
08/09/2006	10422638	7	ACTION MEMORANDUM FROM JEFFERY CROWLEY, EPA REGION 4 TO BEVERLY BANISTER, EPA REGION 4. REQUESTING A \$2 MILLION EXEMPTION, 12 MONTH EXEMPTION AND CEILING INCREASE TO CONTINUE SITE STABILIZATION OPERATIONS AT THE SITE.
08/09/2006	10492393	7	ACTION MEMORANDUM FROM JEFFERY J. CROWLEY, EPA TO BEVERLY BANISTER, EPA REGARDING REQUEST FOR A \$2 MILLION EXEMPTION, 12-MONTH EXEMPTION, AND CEILING INCREASE AT THE LWD INC. SITE.
08/11/2006	10299434	2	ANNOTATED ADMINISTRATIVE RECORD SITE-SPECIFIC DOCUMENT INDEX, KYD088438817, LWD, INC. REMOVAL SITE, CALVERT CITY, MARSHALL COUNTY, KENTUCKY.
08/11/2006	10434189	2	ADMINISTRATIVE RECORD SITE-SPECIFIC DOCUMENT INDEX, KYD088438817, LWD, INC. REMOVAL SITE, CALVERT CITY, MARSHALL COUNTY, KENTUCKY.
08/24/2006	10448941	3	POLLUTION REPORT - (POLREP) NUMBER 7 COVERING REPORTING PERIOD 07/12/2006 THROUGH 08/24/2006.
10/07/2006	10448959	3	POLLUTION REPORT - (POLREP) NUMBER 8 COVERING REPORTING PERIOD 08/25/2006 THROUGH 10/07/2006.
10/19/2006	10501347	47	LETTER FROM SHANE HITCHCOCK, EPA TO C. J. OBRIEN, JR, MONTGOMERY TANK LINES INC REGARDING NOTICE OF POTENTIAL LIABILITY.
10/19/2006	10468236	46	LETTER FROM SHANE HITCHCOCK, EPA TO HAROLD WAGONER, AIR PRODUCTS AND CHEMICALS, INC. ISSUING NOTICE LETTER AND OPPORTUNITY TO NEGOTIATE FOR REMOVAL ACTION WITH ENCLOSURES.

DOC DATE 10/31/2006	DOCID 10448946	PAGES 3	TITLE SUBJECT POLLUTION REPORT - (POLREP) NUMBER 9 COVERING REPORTING PERIOD 10/08/06 THROUGH 10/31/06.
12/01/2006	10449182	3	POLLUTION REPORT - (POLREP) NUMBER 10 COVERING REPORTING PERIOD 11/01/2006 THROUGH 11/26/2006.
12/08/2006	10471126	94	LETTER FROM SHANE HITCHCOCK, EPA TO PETER BEVANS, BP OIL COMPANY NOTIFYING OF POTENTIAL LIABILITY AND OFFER TO NEGOTIATE FOR REMOVAL ACTION.
12/08/2006	10492446	61	LETTER FROM SHANE HITCHCOCK, EPA TO ANITA K. DAMATO, LAIDLAW ENVIRONMENTAL SERVICES (NORTH EAST), INC TRANSMITTING NOTICE OF POTENTIAL LIABILITY AND OFFER TO NEGOTIATE FOR REMOVAL ACTION.
12/20/2006	10449211	1	POLLUTION REPORT - (POLREP) NUMBER 11 COVERING REPORTING PERIOD 11/27/2006 THROUGH 12/20/2006.
02/23/2007	10450825	3	POLLUTION REPORT - (POLREP) NUMBER 12.
02/28/2007	10522657	92	ADMINISTRATIVE SETTLEMENT AGREEMENT AND ORDER ON CONSENT FOR REMOVAL ACTION, DOCKET NO. CERCLA-04-2007-3759, LWD INC.
03/07/2007	10578559	58	LETTER FROM TODD HAVERKOST, ENSAFE INC TO GLENN ADAMS, EPA TRANSMITTING DRAFT PHASE I WORK PLAN.
03/14/2007	10449403	3	POLLUTION REPORT - (POLREP) NUMBER 13 COVERING REPORTING PERIOD 02/23/2007 THROUGH 03/14/2007.
03/14/2007	10616192	81	PHASE 2 WORK PLAN FOR THE LWD, INC. SITE.
03/15/2007	10616191	57	PHASE 1 WORK PLAN FOR THE LWD, INC. SITE, REVISION 1.
03/27/2007	10578560	86	PHASE 2 WORK PLAN.
06/22/2007	10451076	3	POLLUTION REPORT - (POLREP) NUMBER 16 COVERING REPORTING PERIOD 06/07/2007 THROUGH 06/22/2007.

DOC DATE 07/30/2007	<u>DOCID</u> 10451111	PAGES 3	TITLE SUBJECT POLLUTION REPORT - (POLREP) NUMBER 17 COVERING REPORTING PERIOD 06/23/2007 THROUGH 07/27/2007.
10/01/2007	10451277	3	POLLUTION REPORT (POLREP) NUMBER 18 PHASE 3 ACTIVITIES BEGIN.
10/26/2007	10451312	3	POLLUTION REPORT (POLREP) NUMBER 19.
12/05/2007	10451311	3	POLLUTION REPORT (POLREP) NUMBER 20 FOR REPORTING PERIOD 10/29/2007 THROUGH 12/05/2007.
12/20/2007	10532087	3	POLREP NO. 21 FOR THE REPORTING PERIOD 12/03/2007 TO 12/21/007 - LWD, INC.
12/20/2007	10992643	3	POLLUTION REPORT (POLREP) NO: 21, LWD, INC. CALVERT CITY, KY.
01/23/2008	10992644	3	POLLUTION REPORT (POLREP) NO: 22, LWD, INC. CALVERT CITY, KY.
02/15/2008	10992645	3	POLLUTION REPORT (POLREP) NO: 23, LWD, INC. CALVERT CITY, KY.
03/31/2008	10556443	4	POLLUTION REPORT (POLREP) NUMBER 24 FOR THE REPORTING PERIOD 02/15/2008 TO 03/28/2008, LWD, INC., CALVERT CITY, KENTUCKY.
06/05/2008	10621668	4	POLREP NO. 25 FROM STEVE SPURLIN, EPA REGARDING LWD INC.
03/30/2009	10845216	1138	APPENDIX B - WASTE DISPOSAL DOCUMENTATION - DRAFT FINAL REMOVAL ACTION COMPLETION REPORT, LWD, INC. SITE, CALVERT CITY, KENTUCKY. [1 OF 2]
03/30/2009	10845215	556	DRAFT FINAL REMOVAL ACTION COMPLETION REPORT, LWD, INC. SITE, CALVERT CITY, KENTUCKY.
03/30/2009	10845217	1087	APPENDIX B - WASTE DISPOSAL DOCUMENTATION - DRAFT FINAL REMOVAL ACTION COMPLETION REPORT, LWD, INC. SITE, CALVERT CITY, KENTUCKY. [2 OF 2]

DOC DATE	DOCID	PAGES	TITLE SUBJECT	
07/08/2009	10845221	53	FINAL SCREENING EVALUATION REPORT FOR THE FORMER INCINERATOR BUILDING AREA, LWD, INC. SITE, CALVERT CITY, KENTUCK	ľ.
09/30/2009	10684209	777	FINAL REMOVAL ACTION REPORT, LWD INC. SITE, CALVERT CITY, MARSHALL COUNTY, KENTUCKY. EPA CONTRACT EP-W-05-054, TDE	1
09/30/2009	10004209	111	NO. TTEMI-05-001-0004.	
Number of I)o aumantar		40	
Number of 1	ocuments:		40	
Number of P	ages:		4313	

United States Environmental Protection Agency Region IV POLLUTION REPORT

Date:

Friday, March 10, 2006

From:

Steve Spurlin

Subject: LWD, Inc.

2475 Industrial Parkway, Calvert City, KY

Latitude: 37.0469000 Longitude: -88.3320000

POLREP No.:

Site #:

A4LQ

Reporting Period: 3/6/2006 - 3/10-2006 **D.O.** #: Start Date:

3/2/2006

Response Authority: CERCLA

Mob Date:

3/6/2006

Response Type:

Incident Category:

Emergency

Demob Date:

NPL Status:

Non NPL

Completion Date: CERCLIS ID #:

Contract #

Removal Assessment

KYD088438817

RCRIS ID #:

Site Description

The LWD facility is a former hazardous waste incinerator that began operation in the early 1970's and received it's last shipment of hazwaste in early 2003. The site was referred to ERRB via the State of Kentucky for possible removal action in February 2006. Upon review of the facility, the OSC noticed that the containment area surrounding a tank farm on the north end of the facility was becoming full of collecting rainwater. The rainwater was mixing with oils and other chemicals in the containment area to produce a hazardous waste. At the time of inspection, the waste was approx. 4' deep and only 3' from overtopping the containment area walls. An emergency response was initiated to address the tank farm. The ER will consist of pumping the water out of the containment area, cleaning the cement, and stabilizing the tanks for any leaks. The last step will be to provide an avenue for the collecting water to be kept out of the containment area.

At the same time, a removal assessment is taking place at the facility to address the future removal needs and enforcement process.

Current Activities

The following activities took place during the reporting period:

ER Phase:

During the reporting period, ERRS crews have been continuously pumping water from the containment area as well as from three other cells that drain into the larger area. To date, approximately 130,000 gal of contaminated water have been pumped into frac tanks on site. During the middle of the week crews were able to get to the floor of the containment areas and squeegee and pressure wash a good portion of the floor. Because of the weather forecast for the area during the week, it was decided to focus on getting upper containment cells (which are

smaller, but ultimately drain into the larger cell) clean to prevent contaminated water from pouring into the larger cell. This was accomplished during the day on March 9. On March 9, the area received significant rainfall and this caused the large containment area to collect around 6" of water that will need to be pumped. A sample was also taken from the frac tanks that are being used for storage to determine future disposal options.

Removal Assessment Phase:

Removal assessment activities were able to be completed during this reporting period. START took waste and water samples from tankers, roll-offs, holding tanks, and sludge on site for analysis. A pH was also taken from an AST on site that is thought to hold caustic product and came back at 13. Also, pH readings were taken from each roll-off stored outside. This is to aid in possible disposal options later on.

Planned Removal Actions

The planned activities for the next reporting period:

- Continue to pump from the containment area.
- Once the water has been removed, pressure wash all surfaces to prevent future contamination.
- Secure all leaking tanks and tankers on site.
- START will begin going through the facility and conducting a photo log as well as begin to look at labels that are on drums and roll-offs.

Next Steps

Once the sample analysis is completed, a disposal option for the water on site will have to be created. Several options are being considered including releasing it to the local POTW, releasing it to a landfill on site, or sending it off for disposal elsewhere.

Key Issues

There are several key issues at this facility:

- The tanks that are in the tank farm are sitting on top of fire bricks, not the ground. This poses a concern in that oil and other hazardous waste is suspended in between those bricks which makes it hard to clean. This will have to be address in the future.
- Over the weekend (3/11 3/13) it is expected to rain in the Calvert City area. This creates more water that needs to be pumped into frac tanks and disposed of. Also, when the water gets too high, it makes pressure washing more difficult.
- When it rains at this facility, not only does the containment area fill with water, but due to the structural integrity of the incinerator building, the inside of that building floods as well, making it difficult to conduct operations inside the building.

response.epa.gov/LWD



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx? site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<<	<	1	2	3	4	5	 >	>>	Page Size	5	~
											-

Image 🔯

Description

Category

Tags

View of Site from parking lot

3/15/2006

Date



(image_zoom.aspx? site_id=2101&counter=28890&category =&ReturnURL=image_listview.aspx)

Incinerator Building

12/1/2007



(image_zoom.aspx? site_id=2101&counter=57419&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=57420&category =&ReturnURL=image_listview.aspx)

Incinerator Building 1/2 gone

2/7/2008



(image_zoom.aspx? site_id=2101&counter=57421&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28978&category =&ReturnURL=image_listview.aspx)

Incinerator Building gone

2/14/2008

Containment area prior to pumping

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251894030581473)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<<	<	1	2	3	4	5	***	>	>>	Page Size	5	~
											F2 2.9	-

Image 🗖

Description

Category

Date

Tags

View of Site from parking lot

3/15/2006



(image_zoom.aspx? site_id=2101&counter=28890&category =&ReturnURL=image_listview.aspx)

Incinerator Building

12/1/2007



(image_zoom.aspx? site_id=2101&counter=57419&category =&ReturnURL=image_listview.aspx)



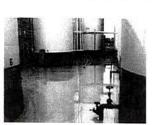
(image_zoom.aspx? site_id=2101&counter=57420&category =&ReturnURL=image_listview.aspx)

Incinerator Building 1/2 gone

2/7/2008



(image_zoom.aspx? site_id=2101&counter=57421&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28978&category =&ReturnURL=image_listview.aspx)

Incinerator Building gone

2/14/2008

Containment area prior to pumping

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251894739003573)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<< < 1 2 3 4 5 ... > >> Page Size 5 🗸

Image 🗗

Description

Category

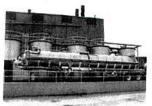
Date

Tags

Tank farm prior to pumping



(image_zoom.aspx? site_id=2101&counter=28489&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28979&category =&ReturnURL=image_listview.aspx)



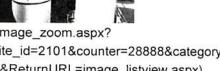
(image_zoom.aspx? site_id=2101&counter=28891&category =&ReturnURL=image_listview.aspx) One of several tankers on site

Containment area after pressure washing

3/15/2006



(image_zoom.aspx? site_id=2101&counter=28888&category =&ReturnURL=image_listview.aspx)



View of west side of tank farm

View Of Tank Farm from Above

3/15/2006

3/15/2006



(image_zoom.aspx? site_id=2101&counter=28892&category =&ReturnURL=image_listview.aspx)

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895176025532)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx? site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

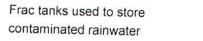
<< < 1 2 3 4 5 > >> Page Size 5		<<	<	1	2	3	4	5	***	>	>>	Page Size	5	~
---------------------------------	--	----	---	---	---	---	---	---	-----	---	----	-----------	---	---

		rage Size	~	
Image 🗖	Description	Category	Date	Tags
	Tanker washout container		3/15/2006	
(image_zoom.aspx?				
site_id=2101&counter=28898&category				

site_id=2101&counter=28898&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28889&category =&ReturnURL=image_listview.aspx)



3/15/2006



site_id=2101&counter=28897&category =&ReturnURL=image_listview.aspx)

Tanks used to store caustic

3/15/2006



(image_zoom.aspx? site_id=2101&counter=28894&category =&ReturnURL=image_listview.aspx)

Rolloff staging area

3/15/2006



3/15/2006



(image_zoom.aspx? site_id=2101&counter=28895&category =&ReturnURL=image_listview.aspx)

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895317584954)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<< < 1 2 3 4 5 ... > >> Page Size 5 \(\sqrt{5} \)

Image Description Category Date Tags



(image_zoom.aspx? site_id=2101&counter=28490&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28488&category =&ReturnURL=image_listview.aspx)

Lab trailers

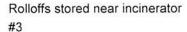
3/15/2006



(image_zoom.aspx? site_id=2101&counter=28899&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28900&category =&ReturnURL=image_listview.aspx)



3/15/2006



(image_zoom.aspx? site_id=2101&counter=28918&category =&ReturnURL=image_listview.aspx)

The Lab

3/16/2006

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895437426096)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

	<<	<	1	2	3	4	5	***	>	>>	Page Size	5 🗸	J
--	----	---	---	---	---	---	---	-----	---	----	-----------	-----	---

lmage 🔯



Description Category Date

3/16/2006

Tags

(image_zoom.aspx? site_id=2101&counter=28919&category =&ReturnURL=image_listview.aspx)



Samples found in the lab

Coolers left outside lab

3/16/2006

(image_zoom.aspx? site_id=2101&counter=28920&category =&ReturnURL=image_listview.aspx)



(image_zoom.aspx? site_id=2101&counter=28921&category =&ReturnURL=image_listview.aspx) Walls of incinerator building separating from foundation

3/16/2006



(image_zoom.aspx? site_id=2101&counter=28922&category =&ReturnURL=image_listview.aspx)

Bottom of caustic tower

3/16/2006



(image_zoom.aspx? site_id=2101&counter=28923&category =&ReturnURL=image_listview.aspx)

Floor of incinerator building

3/16/2006

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895547423725)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<<	<	***	6	7	8	>	>>	Page Size	5	~	
									(P)		

			Ş	
Image 🖸	Description	Category	Date	Tags
(image_zoom.aspx? site_id=2101&counter=32789&category =&ReturnURL=image_listview.aspx)	Ash		4/20/2006	



(image_zoom.aspx? site_id=2101&counter=32790&category =&ReturnURL=image_listview.aspx)

Onsite, decomissioned landfill.
This is where we are
discharging effluent from WWT.



(image_zoom.aspx? site_id=2101&counter=32791&category =&ReturnURL=image_listview.aspx)

Sludge under rolloff boxes.

4/20/2006

4/20/2006



(image_zoom.aspx? site_id=2101&counter=32792&category =&ReturnURL=image_listview.aspx)

The base of one of the caustic towers.

4/20/2006

Rolloff box and sludge

5/18/2006



(image_zoom.aspx? site_id=2101&counter=32785&category =&ReturnURL=image_listview.aspx)

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895687420677)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<< < ... 6 7 8 > >> Page Size 5 >>

			-
Im	ac	1e	0



(image_zoom.aspx? site_id=2101&counter=32786&category =&ReturnURL=image_listview.aspx)

Description

Category Date

Tags

How many of the drums left in the drum storage warehouse currently look.

5/18/2006



(image_zoom.aspx? site_id=2101&counter=32787&category =&ReturnURL=image_listview.aspx) Construction of WWT System

5/18/2006



(image_zoom.aspx? site_id=2101&counter=32788&category =&ReturnURL=image_listview.aspx) Construction of WWT System

5/18/2006



(image_zoom.aspx? site_id=2101&counter=37728&category =&ReturnURL=image_listview.aspx)



Tank Farm Demolition 2

10/12/2006



(image_zoom.aspx? site_id=2101&counter=37729&category =&ReturnURL=image_listview.aspx)

10/25/2006

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895821479679)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

<< < ... 6 7 8 > >> Page Size 5 >>

	1	n	a	g	е	0.
--	---	---	---	---	---	----



Description

Category Date

Tags

Drums and Totes Staged for Sampling

10/25/2006

(image_zoom.aspx? site_id=2101&counter=37731&category =&ReturnURL=image_listview.aspx)



Tank Farm after Demolition

4/19/2007

(image_zoom.aspx? site_id=2101&counter=43398&category

=&ReturnURL=image_listview.aspx)

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895949289813)



Thumbnails (image_list.aspx?site_id=2101&category=) | List View (image_listview.aspx?site_id=2101&category=) | Photo Log (photo_log.aspx?site_id=2101&category=)

All Images [37]

CATEGORIES

All Images

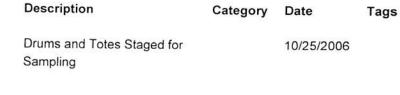
Image 🗖

<< < ... 6 7 8 > >> Page Size 5 🗸

No.	E NE
Artico	79
7	

(image_zoom.aspx? site_id=2101&counter=37731&category

=&ReturnURL=image_listview.aspx)





(image_zoom.aspx? site_id=2101&counter=43398&category =&ReturnURL=image_listview.aspx) Tank Farm after Demolition

4/19/2007

View Slideshow

(/site/GetSlideShowImage.ashx?counter=28890&unique=636251895949289813)